



**ALEXANDER W. KNOWLES**  
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December 6, 2021

**VIA ELECTRONIC FILING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

RE: Application of Kiawah Island Utility, Incorporated to File Proposed Changes in Rates, Charges, Classifications and/or Regulations for Water and Sewer Service  
**Docket No. 2021-324-WS**

Dear Ms. Boyd:

Please allow this letter to serve as the response of the South Carolina Office of Regulatory Staff ("ORS") pursuant to Chief Hearing Officer Directive Order No. 2021-150-H to the Proposed Scheduled Dates, Including Bill Insert to Customers ("Proposed Schedule"), filed by Kiawah Island Utility, Incorporated ("KIU" or "Applicant") in the above-referenced docket on December 6, 2021. KIU filed its Application for an Adjustment of Rates and Charges with the Public Service Commission of South Carolina ("Commission") on November 30, 2021.

ORS is concerned that the Proposed Schedule does not allow adequate time for ORS to conduct its review. As ORS stated in its October 22, 2021 letter in this docket, ORS requests a minimum of four weeks to file its direct testimony from the time the Applicant files its direct testimony and requests at least two weeks from the time the Applicant files rebuttal testimony to submit surrebuttal testimony. A procedural schedule that includes prefiled testimony deadlines that are any more compressed creates significant challenges for ORS in conducting a complete and thorough review of the Applicant's request for a rate increase. Similarly, such a schedule makes it more difficult for ORS to develop clear and complete testimony and positions for presentation to and consideration by the Commission. ORS's concerns regarding the adequacy of time to conduct its review are compounded by the fact that the Applicant did not file direct testimony with its Application, the statutory 6-month timeline for the Commission to rule on the Applicant's rate increase request, as well Commission's need for adequate time following the hearing to consider the record and draft its order. Additionally, the time provided in the Proposed Schedule between surrebuttal and the hearing provides very limited time for the parties to engage regarding areas of compromise or agreement to help streamline and identify issues for focus during the hearing.

Letter – Jocelyn G. Boyd, Esquire  
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To ensure adequate time for ORS to conduct its review, ORS respectfully requests the Commission adopt the following procedural schedule:

Applicant Direct Testimony	Tuesday, February 1, 2022
Other Parties of Record Direct Testimony	Tuesday, March 1, 2022
Applicant Rebuttal	Tuesday, March 15, 2022
Other Parties of Record Surrebuttal	Tuesday, March 29, 2022
Customer Public Hearings	Monday, April 4 and Tuesday, April 5, 2022
Hearing	Week of April 11, 2022
Commission Order Deadline	Tuesday, May 31, 2022 <sup>1</sup>

ORS affirms its previously stated position that a rate-increase applicant should prefile substantive direct testimony and final supporting schedules and financial documentation at the time of its application.<sup>2</sup>

Please note that ORS's requested procedural schedule is based on the Application having been accepted for filing by the Commission on November 30, 2021. By email to the Applicant with copies to all parties of record, the Commission's Chief Clerk asked the Company for assistance locating where the Application had included certain items required by the Commission's regulations. The Applicant responded to the Chief Clerk's inquiries, including by submitting system maps on December 2, 2021. If the date the Commission accepted the Application for filing is later than November 30, 2021, then ORS would respectfully request that its requested proposed procedural schedule be adjusted accordingly.

Thank you for your consideration regarding this matter and for the opportunity to respond to the Proposed Schedule.

Sincerely,

*/s/ Alexander W. Knowles*

Alexander W. Knowles

cc: All Parties of Record (via e-mail)  
 C. Jo Anne Wessinger Hill, Esquire (via e-mail)  
 David Butler, Esquire (via e-mail)

<sup>1</sup> Monday, May 30<sup>th</sup> is Memorial Day.

<sup>2</sup> See, e.g., ORS Letter – Feb. 17, 2021, Docket No. 2020-247-A.